

217/782-2113

"RENEWAL"  
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Trunkline Gas Company  
Attn: Charles Wait, Principal Engineer  
P.O. Box 4967  
Houston, Texas 77210-4967

<u>Application No.:</u> 95120002	<u>I.D. No.:</u> 041808AAF
<u>Applicant's Designation:</u>	<u>Date Received:</u> March 11, 2004
<u>Operation of:</u> Natural Gas Compressor Station	
<u>Date Issued:</u> January 20, 2005	<u>Expiration Date</u> <sup>2</sup> : January 20, 2010
<u>Source Location:</u> 927 North County Road 800E, Rural Tuscola, Douglas County	
<u>Responsible Official:</u> Richards E. Keyser, Vice President Operations and Engineer	

This permit is hereby granted to the above-designated Permittee to OPERATE a Natural Gas Compressor Station, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Michael E. Davidson at 217-782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:MED:jar

cc: Illinois EPA, FOS, Region 3  
USEPA

<sup>1</sup> This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

<sup>2</sup> Except as provided in Condition 8.7 of this permit.

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## 1.0 SOURCE IDENTIFICATION

### 1.1 Source

Trunkline Gas Company - Tuscola Compressor Station  
927 North County Road 800E  
Tuscola, Illinois 61953

I.D. No: 041808AAF  
Standard Industrial Classification: 4922, Natural Gas  
Transmission

### 1.2 Owner/Parent Company

Trunkline Gas Company  
P.O. Box 4967  
Houston, Texas 77210-4967

### 1.3 Operator

Trunkline Gas Company  
P.O. Box 4967  
Houston, Texas 77210-4967

Charles Wait, Principal Engineer  
713/989-7464

### 1.4 General Source Description

The Trunkline Gas Company - Tuscola Compressor Station is in a rural location near Tuscola, Illinois. The source uses five (5) reciprocating engines to recompress and move natural gas through transmission pipelines. Line pressure must be maintained in order to ensure natural gas moves at sufficient volumes for reliable service at all delivery points.

The primary sources of pollutants at this source are the natural gas fired reciprocating engines that power the compressors. These units emit combustion products during normal operation and after shutdown pressurized natural gas is vented to the atmosphere (i.e., blowdown emissions). Secondary emission units at the source include various support activities, which are performed at the Tuscola Compressor Station in order to maintain proper operation of the engines and ancillary equipment. These include but are not limited to the following: Separators, which are used to remove liquid condensate from the transmission pipelines; Tank TSG1 which is used to store the condensate prior to its being transported offsite; and fugitive emissions from the leaking pipeline components. Some of these activities have been determined to be insignificant emission units.

## 2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AIRS	Airs Facility Subsystem Source Classification Codes And Emission Factor Listing for Criteria Air Pollutants, U.S. Environmental Protection Agency, Research Triangle Park, NC. Office of Air Quality Planning and Standards, EPA/450/4-90/003 (March 1990)
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
°F	degrees Fahrenheit
ft <sup>3</sup>	cubic feet
gm/Hp-hr	gram per horsepower hour
gr	grains
GRI	Topical Report: Measurement of Air Toxic Emissions from Natural Gas Fired Internal Combustion Engines at Natural Gas Transmission and Storage Facilities., Volume 1., Gas Research Institute (GRI-96/0009.1)., February, 1996.
HAP	Hazardous Air Pollutant
Hp	horsepower
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg/hr	kilograms per hour
kW	kilowatts
lb	pound
lb/Hp-hr	pound per horsepower hour
mmBtu	Million British thermal units
mcf	thousand cubic feet
mmcf	million cubic feet
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RICE	Reciprocating Internal Combustion Engine
RMP	Risk Management Plan
scf	Standard Cubic Feet

SO <sub>2</sub>	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquids
VOM	Volatile Organic Material
wt. %	weight percent
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Self-Contained Bead Blaster Cabinet  
20 Gallon Safety Kleen Solvent Parts Washer  
Pipeline Liquids Tanker Truck Loading

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

### 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

#### 4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Unit No.	Description	Emission Control Equipment
6001	Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 Hp)	None
6002	Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 Hp)	None
6003	Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 Hp)	None
6004	Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 Hp)	None
6005	Compressor Reciprocating Engine (Clark) Model TLA-8 (2,700 Hp)	None
Fugitive Emissions	Fugitive Losses from Leaking Piping Components	None

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of nitrogen oxides and carbon monoxide emissions.
- 5.1.2 This permit is issued based on the source being a major source of HAPs.
- 5.1.3 For purposes of the CAAPP and Title I of the Clean Air Act, Trunkline Gas Company is considered a single source with Panhandle Eastern Pipe Line Company, I.D. No. 041804AAC, located at 575 East Highway U.S. 36, Tuscola, Illinois. The source has elected to obtain separate CAAPP permits for these locations.

### 5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
  - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured based upon the demonstrated historical operation of the source.
  - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
  - c. No person shall cause or allow the emissions of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.

- d. No person shall cause or allow the loading of any organic material with a vapor pressure of 2.5 psia or more at 70°F, e.g., gasoline, into any stationary tank having a storage capacity of greater than 946 liters (250 gal), unless such tank is equipped with a permanent submerged loading pipe or submerged fill, or an equivalent device approved by the Illinois EPA, pursuant to 35 IAC 215.122(b) and (c).
- 5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- 5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:
- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
  - b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.
- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 This permit is issued based on the source being subject to 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. [40 CFR 63.6585]

An affected emission unit or source is any existing, new, or reconstructed stationary RICE with a site-rating of more than 500 brake horsepower located at a major source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand. As defined in the NESHAP, a stationary RICE is existing if the source commenced construction or reconstruction of the stationary RICE before December 19, 2002. [40 CFR 63.6590(a)]

Based upon representations made in the application, the affected RICES are classified as existing spark ignition 2 stroke lean burn (2SLB) stationary RICES. However, as shown in 40 CFR 63.6590(b)(3), these RICES are exempt from the requirements of 40 CFR Part 63, Subpart ZZZZ and Subpart A of the NESHAP. [40 CFR 63.6590(b)(3)]

### 5.3 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the source not being subject to the requirements of 40 CFR Part 60 Subpart KKK – “Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants” because the source is not a “natural gas processing plant”, as defined in 40 CFR 60.631. [40 CFR 60.630(e)]
- b. This permit is issued based on the source not being subject to the requirements of 40 CFR Part 60 Subpart LLL – “Standards of Performance for Onshore Natural Gas Processing: SO<sub>2</sub> Emissions” because the source does not have any affected facilities, as defined in 40 CFR 60.640 and 60.641. [40 CFR 60.640]
- c. This permit is issued based on the source not being subject to 40 CFR Part 61, Subpart V – National Emission Standard for Equipment Leaks (Fugitive Emission Sources) because the source does not contain an affected emission unit as specified in 40 CFR 61.240. Specifically, as defined in 40 CFR 61.241, the emission units at the source are not intended to operate in volatile hazardous air pollutant (VHAP) service. [40 CFR 61.240]

- d. This permit is issued based on the source not being subject to 40 CFR Part 63, Subpart HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities, because the source is not a natural gas production facility as defined in 40 CFR 63.761. [40 CFR 63.760(d)]
- e. This permit is issued based on the source not being subject to 40 CFR Part 63, Subpart HHH–National Emission Standards For Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities, because the source does not contain any affected (designated) emission sources (i.e., glycol dehydration units) specified in 40 CFR 63.1270(b). [40 CFR 63.1270(c)]
- f. This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the source is not subject to an emission limitation or standard for the applicable regulated air pollutant.

#### 5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

#### 5.5 Source-Wide Emission Limitations

##### 5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

##### Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	67.77
Sulfur Dioxide (SO <sub>2</sub> )	0.24
Particulate Matter (PM)	19.42
Nitrogen Oxides (NO <sub>x</sub> )	2,679.85
HAP, Not Included in VOM or Particulate Matter	----
Total	2,767.28

#### 5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

#### 5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

### 5.6 General Recordkeeping Requirements

#### 5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

#### 5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

### 5.7 General Reporting Requirements

#### 5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VARIABLE Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

## 7.0 UNIT SPECIFIC CONDITIONS

### 7.1 Group 1: Natural Gas Fired Internal Combustion Engines

#### 7.1.1 Descriptions

The Permittee operates five (5) 2 cycle lean burn natural gas fired reciprocating engines which provide power to compressor units at the source. The compressors recompress and move natural gas through transmission pipelines. Line pressure must be maintained in order to ensure natural gas moves at sufficient volumes for reliable service at all delivery points.

The principle source of emissions is from the combustion products emitted during the combustion of natural gas within the engines. These units also emit pressurized natural gas during "blowdown" of the engines.

"Blowdown" occurs when a particular compressor engine is removed from service for an extended period. If a particular engine is removed from service for more than four hours or if maintenance requires it, the natural gas within the engine and the compressor is released to the atmosphere.

#### 7.1.2 List of Emission Equipment and Pollution Control Equipment

Unit No.	Description	Emission Control Equipment
6001	Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 Hp)	None
6002	Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 Hp)	None
6003	Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 Hp)	None
6004	Compressor Reciprocating Engine (Clark) Model TLA-6 (2000 Hp)	None
6005	Compressor Reciprocating Engine (Clark) Model TLA-8 (2,700 Hp)	None

#### 7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected engine" for the purpose of these unit-specific conditions, is compressor engines used in transporting natural gas for the purpose of these unit specific conditions, identified in Condition 7.1.2.
- b. Each affected engine is subject to the emission limits identified in Condition 5.2.2.

- c. The emissions of sulfur dioxide into the atmosphere from any affected engine shall not exceed 2000 ppm, [35 IAC 214.301].
- d. The affected engines are subject to 35 IAC 215 Subpart K, which provides that the emissions of VOM into the atmosphere shall not exceed 3.6 kg/hr (8 lb/hr) from any engine, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall only apply to photochemically reactive material [35 IAC 215.301].

#### 7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected units not being subject to the requirements of 35 IAC 212.321 or 212.322, because the liquid and gaseous fuels and combustion air used in the units are excluded from the definition of process weight rate, as defined in 35 IAC 211.5250.
- b. This permit is issued based on affected engines not being subject to the requirements of 35 IAC 215.143 because the blowdown emissions are not capable of causing an excessive release, pursuant to the definition of "excessive release" - 35 IAC 211.2090.
- c. The affected engines are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected engines are not by definition a fuel combustion emission unit.
- d. The affected engines are not subject to 35 IAC 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected gas turbine is not by definition a fuel combustion emission unit.

#### 7.1.5 Operational and Production Limits and Work Practices

Natural Gas shall be the only fuel used to fire the affected engines at the source.

#### 7.1.6 Emission Limitations

There are no specific emission limitations for this unit; however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Testing Requirements

None

7.1.8 Inspection and Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected engine to demonstrate compliance with Conditions 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Information demonstrating that the engines are exempt from the requirements of 40 CFR Part 63, Subpart ZZZZ and Subpart A of the NESHAP;
- b. Natural gas consumption for each affected engine, million per month and million per year;
- c. Each engine's hours of operation; and
- d. Annual aggregate NO<sub>x</sub>, VOM, SO<sub>2</sub>, and PM emissions based on compliance procedures in Condition 7.1.12, with supporting calculations (ton/year).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Emissions of NO<sub>x</sub>, PM, SO<sub>2</sub>, or VOM from the affected engines in excess of the limits specified in Condition 5.5.1 within 30 days of such an occurrence.

7.1.11 Operational Flexibility/ Anticipated Operating Scenarios

None

7.1.12 Compliance Procedures

Compliance with the source-wide emission limits shall be based on the recordkeeping requirements of Conditions 7.1.9 and the use of the following emissions estimating methods.

- a. Compliance with Condition 5.2.2(c) is assumed to be achieved by the work-practices inherent in operation of natural gas-fired reciprocating engines, so that no compliance procedures are set in this permit addressing this regulation.

- b. For the purpose of calculating blowdown emissions from the affected engines, the following emission factor shall be used. The factor is based upon the maximum volume of natural gas vented per blowdown (10,000 scf/blowdown), the VOM content of the natural gas (1.082 lb VOM/mcf), and the maximum number of blowdowns per engine per year (75).

Blowdown Emissions = 10,000 scf/blowdown x 1.082 lb VOM/mcf x mcf/1000 scf x 75 blowdowns per engine per year

Blowdown Emissions Per Engine = 811.5 lb VOM/(Engine Year)

- c. i. For the purpose of calculating operating emissions from the affected engines, the following emission factors shall be used. Alternative factors are acceptable provided that sufficient documentation is included with the emissions calculations to demonstrate the appropriateness of the new factors. Revised emission factors found in AP-42 or other factors published by USEPA; factors developed by the source, e.g., factors developed through stack testing; factors developed by GRI; or factors developed by the engine manufacturer are acceptable.

A. Engines 6001 - 6004  
2000 Hp 2 Cycle Lean Burn

<u>Pollutant</u>	<u>Emission Factor (gm/Hp-hr)</u>	<u>Factor Basis</u>	<u>Emission Rate (lb/hr)</u>
NO <sub>x</sub>	25	1	110.0
SO <sub>2</sub>	----	2	0.03
VOM	0.72	1	2.85
PM	10 lb/mmcf	3	0.17

B. Engine 60005  
2700 Hp 2 Cycle Lean Burn

<u>Pollutant</u>	<u>Emission Factor (gm/Hp-hr)</u>	<u>Factor Basis</u>	<u>Emission Rate (lb/hr)</u>
NO <sub>x</sub>	25	1	148.50
SO <sub>2</sub>	----	2	0.04
VOM	0.40	1	2.38
PM	10 lb/mmcf	3	0.23

1 Factor based upon manufacturer's specifications;

2 Emissions factor is based upon the sulfur content of natural gas (6 gr/1,000 ft<sup>3</sup>), calculated below, and the horsepower rating of the engine;

6 gr Sulfur/1,000 scf x 2 SO<sub>2</sub>/Sulfur  
x 1b/7,000 gr x scf/1,000 Btu x  
8,395 Btu/Hp-hr = 0.0000144 lb  
SO<sub>2</sub>/Hp-hr

3 AIRS

ii. Engine Emission (lb or grams) = (Operating Hours of Engine, hr) x (The Appropriate Emission Rate Factor, lb/hr)

7.2 Group 2: Fugitive Losses from Leaking Piping Components  
Control: None

7.2.1 Description

Equipment and pipeline components (i.e., valves, flanges, relief valves, compressor seals, etc.) at the source that have the potential to leak natural gas and as a result VOM emissions.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Fugitive Emissions	Fugitive Losses from Leaking Piping Components	None

7.2.3 Applicability Provisions and Applicable Regulations

An "affected leaking piping components" for the purpose of these unit specific conditions, is each leaking pressure relief device, open-ended valve or line, valve, flange or other pipeline connector that is in service at this natural gas pumping station.

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected leaking piping components are not subject to the requirements of 35 IAC 215.142 because the natural gas compressors are not used to compress volatile organic liquids.
- b. The affected leaking piping components are not subject to the requirements of 35 IAC 215.143 because, pursuant to the definition in 35 IAC 211.2090, the safety relief valves are not capable of causing an excessive release.
- c. The affected leaking piping components are not subject to the requirements of 40 CFR 60 Subpart KKK "Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants" because this source is not a "natural gas processing plant", as defined in 40 CFR 60.631.

7.2.5 Operational and Production Limits and Work Practices

N/A

7.2.6 Emission Limitations

N/A

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for all affected components to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7) (a) and (b) of the Act:

- a. Number of Valves; Flanges and Screwed Fittings; Relief Valves; Compressor Seals and other leaking components

7.2.10 Reporting Requirements

None

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1 of this permit shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- a. For purpose of estimating fugitive VOM emissions from leaking piping components at the source, the following emission factors shall be used:

Piping Component	Natural Gas	VOM Emissions
	Emissions (lb/hr/component <sup>3</sup> )	(lb/hr/component <sup>2</sup> )
Valve	0.00992	0.00128
Flanges and Screwed Fittings	0.00086	0.00001
Other	0.01940	0.00128

<sup>1</sup> Emission factors for natural gas emissions are derived from the emission factors found in the USEPA guidance document 1995 Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017); Table 2-4 - "Oil And Gas Production Operations Average Emission Factors".

<sup>2</sup> Emission factors for VOM emissions are derived from the emission factors found in the USEPA guidance document 1995 Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017); Table 2-4 - "Oil And Gas Production Operations Average Emission Factors" and fraction of VOM in Natural Gas (i.e., 0.0662).

<sup>3</sup> The "other" equipment type was derived from compressors, diaphragms, drains, dump arms, hatches, instruments, meters, pressure relief valves, polished rods, relief valves, and vents. This "other" equipment type should be applied for any equipment type other than connectors, flanges, open-ended lines, pumps, or valves.

Total hourly emissions are determined from the sum of the emissions for each component. Component emissions are determined by multiplying the total number of each component i by the appropriate emission factor.

$$E_{VOM} = \sum F_i \times N_i$$

Where:

$E_{VOM}$  = Total hourly emissions

i = Specific Component

$F_i$  = Appropriate VOM Factor for the Specific Component

$N_i$  = Number of Components

Annual emissions shall be determined by multiplying the total hourly emission by 8,760 hours per year.

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after October 8, 2004 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not

constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

#### 8.6 Reporting Requirements

##### 8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

#### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;

- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234
  - iii. Illinois EPA - Air Permit Section (MC 11)  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506
  - iv. USEPA Region 5 - Air Branch  
  
USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to

the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

#### 9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

##### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

##### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

#### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7) (o) (iv) of the Act].

### 9.6 Recordkeeping

#### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

#### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

#### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7) (e) (ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

### 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7) (p) (v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission

limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

##### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

## 10.0 ATTACHMENTS

### 10.1 Attachment 1 - Summary of Affected Engines

TABLE 1-1

Unit No.	Date Installed	Description	Serial No.	Location	Capacity
6001	1964	Compressor Reciprocating Engine (Clark) Model TLA-6	73699	Engine Room	2,000 Hp
6002	1964	Compressor Reciprocating Engine (Clark) Model TLA-6	73700	Engine Room	2,000 Hp
6003	1964	Compressor Reciprocating Engine (Clark) Model TLA-6	73701	Engine Room	2,000 Hp
6004	1964	Compressor Reciprocating Engine (Clark) Model TLA-6	73713	Engine Room	2,000 Hp
6005	1968	Compressor Reciprocating Engine (Clark) Model TLA-8	78566	Engine Room	2,700 Hp

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

### 10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
  - Do not violate any applicable requirement;
  - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

### 3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency  
Division Of Air Pollution Control -- Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506

<b>Application For Construction Permit (For CAAPP Sources Only)</b>	<b>For Illinois EPA use only</b>
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

#### 10.5 Attachment 5 - dance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7.
  - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
- 8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
- 9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506